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JAMES P. NOLAN & ASSOCIATES

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Telephone: (732) 636-3344

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD CASAGRAND and DYLAN
SCHLOSSBERG individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GANNETT CO., INC., a Delaware
corporation, and MARKETING PLUS,
INC., a New Jersey corporation,

Defendants.

) **DOCUMENT ELECTRONICALLY FILED**

)

) Civil Action No. 2:14-cv-00022(SRC)(CLW)

)

) **MOTION TO ADMIT COUNSEL**

) **PRO HAC VICE**

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PURSUANT TO LOCAL CIVIL RULE 101.1 and the affirmation accompanying this Motion, I, Fred Rubenstein, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Joseph W. Sanscrainte, Esq.
The Law Office of Joseph W. Sanscrainte
1120 Avenue of the Americas, 4th Floor
New York, NY 10036
Tel: (212) 626-6934

Joseph W. Sanscrainte, Esq. is a member in good standing of the Bar of the State of New York. There are no pending disciplinary proceedings regarding Joseph Sanscrainte, Esq. in any State or Federal Court.

Dated: Woodbridge, New Jersey
March 10, 2014

Respectfully submitted,

JAMES P. NOLAN & ASSOCIATES

By: /s Fred Rubenstein
Fred Rubenstein, Esq.

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) **AFFIRMATION OF FRED RUBENSTEIN**
) **IN SUPPORT OF MOTION TO ADMIT**
) **COUNSEL PRO HAC VICE**

FRED RUBENSTEIN, an attorney duly admitted to practice before the courts of this State, affirms the following to be true under penalties of perjury:

1. I am an attorney with the law firm of James P. Nolan & Associates, co-counsel to Defendant Marketing Plus, Inc. I am fully familiar with the facts and circumstances of this matter and make this affirmation on my own personal knowledge.

2. I am a member in good standing of the bar of the State of New Jersey, and I have been admitted to practice before this Court.

3. Mr. Sanscrainte is an attorney licensed to practice law in the state of New York and has been a member in good standing of the New York Bar since 1996. See Exhibit

A.

4. There are no disciplinary proceedings pending against Mr. Sanscrainte, nor has he ever been subject to any disciplinary proceedings.

5. Mr. Sanscrainte has never been subject to any suspension or disbarment proceedings.

6. Mr. Sanscrainte is familiar with and shall be governed by the rules of this Court, the rules of professional conduct and all other requirements governing the professional behavior of members of the New Jersey State Bar.

7. I respectfully submit a proposed order granting the admission of Joseph W. Sanscrainte, Esq., *pro hac vice*, which is attached as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Joseph W. Sanscrainte, Esq., *pro hac vice*, to represent Plaintiff Manhattan Professional Group in the above-captioned matter be granted.

Dated: Woodbridge, New Jersey
March 10, 2014

Respectfully submitted,

JAMES P. NOLAN & ASSOCIATES

By: /s Fred Rubenstein
Fred Rubenstein, Esq.

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EXHIBIT A

ORDER

The above application for the admission *pro hac vice* of Joseph W. Sanscrainte, Esq.
is ORDERED GRANTED.

ORDER DATED: _____

WILLIAM T. WALSH, Clerk

By: _____
Deputy Clerk